

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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SUPERB MOTORS INC., TEAM AUTO SALES LLC,
ROBERT ANTHONY URRUTIA, 189 SUNRISE
HWY AUTO LLC, NORTHSHORE MOTOR
LEASING, LLC, BRIAN CHABRIER, individually and
derivatively as a member of NORTHSHORE MOTOR
LEASING, LLC, JOSHUA AARONSON, individually
and derivatively as a member of 189 SUNRISE HWY
AUTO, LLC, JORY BARON, 1581 HYLAN BLVD
AUTO LLC, 1580 HYLAN BLVD AUTO LLC, 1591
HYLAN BLVD AUTO LLC, 1632 HYLAN BLVD
AUTO LLC, 1239 HYLAN BLVD AUTO LLC, 2519
HYLAN BLVD AUTO LLC, 76 FISK STREET
REALTY LLC, 446 ROUTE 23 AUTO LLC and
ISLAND AUTO MANAGEMENT, LLC,

Plaintiffs,

-against-

ANTHONY DEO, SARAH DEO, HARRY
THOMASSON, DWIGHT BLANKENSHIP, MARC
MERCKLING, MICHAEL LAURIE, THOMAS
JONES, CPA, CAR BUYERS NYC INC., GOLD
COAST CARS OF SYOSSET LLC, GOLD COAST
CARS OF SUNRISE LLC, GOLD COAST MOTORS
AUTOMOTIVE GROUP LLC, GOLD COAST
MOTORS OF LIC LLC, GOLD COAST MOTORS OF
ROSLYN LLC, GOLD COAST MOTORS OF
SMITHTOWN LLC, UEA PREMIER MOTORS
CORP., DLA CAPITAL PARTNERS INC., JONES,
LITTLE & CO., CPA'S LLP, FLUSHING BANK,
LIBERTAS FUNDING LLC, and J.P. MORGAN
CHASE BANK, N.A.,

Defendants.

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Case No.: 2:23-cv-6188 (JMW)

**DECLARATION OF ALEX
KIKIROV IN SUPPORT OF
MOTION FOR CONTEMPT
AGAINST DEO DEFENDANTS**

Alex Kikirov declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, that the
following is true and correct:

1. I am a partner of Robert Anthony Urrutia (“Urrutia”) in various businesses that we operate together.

2. As such, I am familiar with all the facts and circumstances heretofore had herein based upon my personal knowledge and a review of documents maintained at Superb Motors Inc. (“Superb”) and Team Auto Sales LLC (“Team”), in addition to information I have learned from employees, customers, vendors, and other third parties concerning the issues relevant to this case and this motion.

3. I am aware that Defendant Anthony Deo (“Deo”) submitted a declaration on October 3, 2023 requesting permission to store certain vehicles subject to the Preliminary Injunction issued by the Hon. Orelia E. Merchant, U.S.D.J. at his home rather than at Northshore or at Amityville (where Deo concedes it is not safe to store the vehicles).

4. On October 28, 2023, at the request of Urrutia, I visited Northshore Motors Leasing, LLC (“Northshore”) at 180 Michael Drive, Syosset, NY 11791.

5. Upon arriving there, I observed that no vehicles were present outside or inside of Northshore. See copies of pictures taken at Northshore annexed hereto as **Exhibit “A.”**

6. I took the pictures using my iPhone device, and I am familiar with the items depicted in all of the foregoing photographs, as I personally took them. All of the photographs are a fair, accurate, and true depiction of what I saw at the time I took the photos. Furthermore, I did not in any way alter, edit, modify, or change any of the photos.

7. The following day, on October 29, 2023, at the request of Urrutia, I visited 3 Hunting Lane, Old Westbury, NY 11568-1541, the address Deo specified in his October 3, 2023 declaration.

8. I went there because Deo averred in that declaration that he wished to store six (6) vehicles subject to the Preliminary Injunction at that location.

9. I did not find any of the six (6) vehicles subject to the Preliminary Injunction at Deo's residence. See copy of picture taken at Deo's home address annexed hereto as **Exhibit "B."**

10. I took this picture using my iPhone device, and I am familiar with the items depicted in the foregoing photograph, as I personally took it. The photograph is a fair, accurate, and true depiction of what I saw at the time I took the photo. Furthermore, I did not in any way alter, edit, modify, or change the photo.

11. Further, while I did observe two (2) vehicles, as depicted in the photo, none of those are subject to the Preliminary Injunction.

12. Moreover, while I observed a four (4) car garage at Deo's residence, it did not appear that any vehicles were inside, nor would it be possible to store six (6) vehicles therein.

13. It is also worthy to note that I observed an Asian family leaving the premises at the time I was there, and it appeared to me that this was their home, not Deo's.

14. Finally, on the day prior, I also went to 3 Saddle Ridge Road, Old Westbury, NY 11568-1151, another known address of Deo.

15. I did not observe any of the six (6) vehicles present there, either. See copies of pictures taken at Northshore annexed hereto as **Exhibit "C."**

16. I took the pictures using my iPhone device, and I am familiar with the items depicted in all of the foregoing photographs, as I personally took them. All of the photographs are a fair, accurate, and true depiction of what I saw at the time I took the photos. Furthermore, I did not in any way alter, edit, modify, or change any of the photos.

17. Based on the foregoing and the arguments made by counsel for Urrutia, Superb, and Team in the accompanying letter motion for contempt, I respectfully request that this Court grant the relief requested therein.

I declare under penalty of perjury that the foregoing is true and correct. Executed on November 2, 2023.

alex kikirov
alex kikirov (Nov 2, 2023 00:07 EDT)
Alex Kikirov






2023-11-01 Kikirov Declaration in Support

Final Audit Report

2023-11-02

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